



# Instructions for Completing the Permit Application for a Stewardship Permit

*Use these instructions to complete the permit application form DEP-STWD-APP-500, prepare supporting documents and publish the applicant's notice of permit application. These instructions are not a substitute for the requirements of the relevant statutes and any regulations thereunder. You should review all applicable laws prior to completing this application. Remember, it is your responsibility to comply with all applicable laws.*

## Introduction

This permit program, administered by the Department of Environmental Protection (DEP), Bureau of Materials Management and Compliance Assurance, Waste Engineering and Enforcement Division (WEED), regulates the sitewide environmental investigation and cleanup ("closure" and corrective action"), the closure and post-closure care of solid waste disposal areas, and the performance of long-term stewardship activities, that includes but is not limited to the maintenance of financial assurance, post-remediation groundwater monitoring, the maintenance of an engineered control or post-closure care of hazardous waste treatment, storage and disposal facilities, including but not limited to, landfills, surface impoundments, waste piles and land treatment units.

If you have any questions regarding this application package, please call WEED at 860-424-3372.

## Who Is Eligible for a Permit?

Any person(s): 1) owning or operating a facility under the Resource Conservation and Recovery Act (RCRA), (i.e., has submitted a RCRA Part A Form), which no longer generates process wastes or receives hazardous wastes from off-site; or 2) required to maintain a solid waste disposal area, or 3) seeking to establish a Corrective Action Management Unit (CAMU) for the management of remediation wastes.

There are six types of Stewardship Permits:

"Closure and Corrective Action", "Corrective Action", "Long-term Obligations", "RCRA Hazardous Waste Land Disposal Facility", "Solid Waste Land Disposal Facility" and "Corrective Action Management Unit". These classes are representative of a facility/site's current phase of environmental investigation and cleanup and are described in detail under "Part II A: Permit Type and Fee Information" of these instructions.

## Permit Renewal

The Permittee is required to renew this permit for any period of time necessary to comply with the requirements of completing closure, post-closure care and corrective action as specified by the DEP or the Environmental Protection Agency (EPA).

Any person renewing a previously issued permit for a facility must apply for renewal of the existing permit by submitting a sufficient permit application at least one hundred eighty (180) days prior to the expiration date of the existing permit. If your renewal application is or may be untimely, (i.e., submitted less than one hundred eighty (180) days before the expiration date), you will be subject to late fees. Please refer to section 22a-6j of the Connecticut General Statutes (CGS). If a renewal application is not submitted prior to the expiration date of the existing permit, then the existing permit is deemed to have expired and you must apply for a new permit.

## Permit Modifications

If you are applying for a *modification* of an active and valid permit, you may be required to submit certain parts of, or an entire permit application. For

further information concerning modifications, please contact WEED at 860-424-3372.

## Permit Transfers

Any person proposing to transfer a DEP permit must submit a completed *Permit Transfer Form* (DEP-APP-006) and transfer fee to DEP. The *Permit Transfer Form* may be used for changes in owners and operators of the licensed activity; if other changes are proposed to the facility, the site, and/or to facility operations, the proposed transferee must also request a permit modification. For further information concerning permit transfers or to obtain a *Permit Transfer Form*, please contact the Permit Assistance Office at 860-424-3003.

## How To Apply

Your permit application must include the following:

- A *Permit Application Transmittal Form* (DEP-APP-001);
- An original *Permit Application for a Stewardship Permit* (DEP-STWD-APP-500) and all supporting documents;
- One copy of the application package;
- The applicable initial fee, paid by check or money order, made payable to the “Department of Environmental Protection”.

Note: The initial fee is the total permit application fee due.

You must submit the above materials together as a package to:

CENTRAL PERMIT PROCESSING UNIT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
79 ELM STREET  
HARTFORD, CT 06106-5127

When submitting your permit application, label your supporting documents as directed on your application form and always include, on each document, the applicant's name as indicated on the *Permit Application Transmittal Form*. Be sure to list these supporting documents in your

table of contents in the Executive Summary. When additional space is necessary to answer a question stated in the application, please insert additional sheets by the appropriate question. Label each sheet with the applicant's name as indicated on the *Permit Application Transmittal Form*, along with the corresponding part number and question number indicated on the permit application form. You should retain a copy of all documents for your files.

## Notice of Permit Application

Section 22a-6g CGS imposes public notification requirements on applicants for certain permits issued by DEP.

In order to comply with these requirements, you must:

1. Immediately after you submit your application to DEP, publish notice of the permit application in a newspaper of general circulation in the area potentially affected by the activity that is the subject of your permit application. Refer to the following list, ([www.ct.gov/dep/lib/dep/permits\\_and\\_licenses/newspapers.pdf](http://www.ct.gov/dep/lib/dep/permits_and_licenses/newspapers.pdf)) for newspapers of general circulation in Connecticut. This notice must follow the format appearing at the end of these notice instructions. The format contains instructions in brackets. You must insert the appropriate information to replace the instructions in the brackets. Be sure to *delete* all instructions that are specified in brackets, in bold and in uppercase type. When a choice is specified in brackets, do not include any of the words in brackets unless they specifically apply to the activity you intend to conduct.
2. Send a copy of the notice to the chief elected official of the municipality in which the regulated activity is proposed. The chief elected official is generally the mayor, 1st selectman, town manager or the chairman or president of the town council, depending on the form of government of the municipality. Specific information for each municipality is listed in The State Register and Manual (often referred to as the Blue Book), which is available on the Secretary of the State's website ([www.ct.gov/sots](http://www.ct.gov/sots)), and is also usually available

at town clerk's offices, the State Library and public libraries. The Secretary of the State's website also has a list of mayors and first selectmen available. If you have questions, you can call the Secretary of the State's office at 860-509-6190 or the town clerk of the appropriate municipality.

3. Attach an *Affidavit of Publication* from the newspaper to a completed *Certification of Notice Form - Notice of Application* (DEP-APP-005A). This form asks you to:
  - a) specify the date and newspaper in which the notice was published;
  - b) certify that a copy of the notice was provided to the chief elected municipal official; and
  - c) identify the municipal official(s) to whom the notice was provided.

This form must be mailed to:

BUREAU OF MATERIALS MANAGEMENT AND  
COMPLIANCE ASSURANCE  
WASTE ENGINEERING AND ENFORCEMENT DIVISION  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
79 ELM STREET  
HARTFORD, CT 06106-5127

The format, provided at the end of these notice instructions, must be used when publishing notice of your application. The format contains instructions in brackets.

You must insert the appropriate information to replace the instructions in the brackets. Be sure to *delete* all instructions that are specified in brackets, in bold and in uppercase type. When a choice is specified in brackets, do not include any of the words in brackets unless they specifically apply to the activity you intend to conduct. If you have any questions about this notice contact WEED at 860-424-3372.

***Your application will not be processed until DEP receives the Affidavit of Publication from the newspaper and the Certification of Notice Form - Notice of Application.***

In addition, DEP may notify you that other forms of notice are required, including the posting of a sign in accordance with section 22a-61 CGS.

## Notice of Permit Application

Town(s): **[LIST ALL TOWNS IN WHICH THE REGULATED  
ACTIVITY IS LOCATED OR WILL HAVE AN EFFECT]**

Notice is hereby given that **[INSERT NAME OF APPLICANT HERE]** (the "applicant") of **[INSERT ADDRESS OF APPLICANT HERE]** has submitted to the Department of Environmental Protection an application under Section 22a-449(c) of the Connecticut General Statutes for a permit to:

**[Closure and Corrective Action]** initiate and conduct closure and corrective action, including environmental investigation and remediation activities at the facility in accordance with sections 22a-6, 22a-449(c) and 22a-454 CGS and section 22a-449(c)-110 RCSA.

**[Corrective Action]** conduct corrective action including remediation activities at the facility in accordance with sections 22a-6, 22a-449(c) and 22a-454 CGS and section 22a-449(c)-110 RCSA.

**[Long-term Obligations]** perform long-term stewardship obligations in accordance with section 22a-449(c)-104(a)(2)(O) RCSA.

**[RCRA Hazardous Waste Land Disposal Facility]** maintain and/or continue post-closure care of a land disposal facility in which hazardous waste(s) will remain in place.

**[Solid Waste Land Disposal Facility]** maintain and/or continue post-closure care of land disposal facility in which solid waste(s) will remain in place.

**[Corrective Action Management Unit]** establish a Corrective Action Management Unit for the management of remediation wastes.

Specifically, the applicant proposes to **[INSERT A BRIEF DESCRIPTION OF THE PROPOSED ACTIVITY AND ITS PURPOSE]**. The proposed activity will take place at **[INSERT THE STREET ADDRESS OR IF NOT AT A STREET ADDRESS GIVE THE SPECIFIC LOCATION OF THE PROPOSED ACTIVITY WITH REFERENCE TO FIXED LANDMARKS E.G., ROADWAY INTERSECTIONS, BRIDGES, OR OTHER STRUCTURES]**. The proposed activity will potentially affect: **[INSERT ANY NATURAL RESOURCES POTENTIALLY AFFECTED BY SUCH ACTIVITY (I.E., WETLANDS; WATERCOURSES, BY NAME; GROUND WATERS; AIR; LAND; TIDAL WETLANDS)]**.

Interested persons may obtain copies of the application from **[INSERT NAME, MAILING ADDRESS AND TELEPHONE NUMBER OF THE APPLICANT'S REPRESENTATIVE]**.

The application is available for inspection at the Department of Environmental Protection, Bureau of Materials Management and Compliance Assurance, Waste Engineering and Enforcement Division, 79 Elm Street, Hartford, CT 06106-5127, telephone 860-424-3372 from 8:30 to 4:30 Monday through Friday.

## **Permit Application Instructions**

(DEP-STWD-APP-500)

Please read the application form and instructions carefully. They have been designed to obtain specific information and any information that is missing or unclear will cause delays in the review process. If any questions are not applicable to your specific activity, please enter "N/A" in the space provided. If a question or supporting document is only required for specific activities it will be noted on the application form and in the instructions.

Please be advised that these instructions are not a substitute for any state or federal statutes or regulations. Be sure to refer to the applicable statutes and regulations while completing your application.

Check the "Available Resources" section at the end of these instructions for assistance in obtaining forms, guidelines, maps, etc. which are referenced in these instructions.

### **Part I: Application Type**

Please indicate whether you are applying for a new permit, for a renewal of an existing permit, or for a modification of an existing permit, by checking the appropriate box. A permit is deemed to be "existing", *only* if it has not yet expired on the date you file your application. Please provide the existing permit number.

The EPA Identification number must also be identified for all existing RCRA facilities.

### **Part II A: Permit Type and Fee Information**

*If applying for a permit modification, skip Part IIA and proceed to Part IIB.*

1. Please check only the appropriate box(es) to identify the permit types and corresponding fees that apply. The following are explanations of the permit types listed.

#### *Closure and Corrective Action:*

Applicable to RCRA hazardous waste facilities that have not completed unit closure and site-wide corrective action in accordance with sections 22a-6, 22a-449(c) and 22a-454 CGS and section 22a-449(c)-100 et.seq. of the Regulations of Connecticut State Agencies (RCSA).

#### *Corrective Action:*

Applicable to RCRA hazardous waste facilities that have completed unit closure but have not completed site-wide corrective action in accordance with sections 22a-6, 22a-449(c) and 22a-454 CGS and sections 22a-449(c)-100 et. seq. RCSA.

#### *Long-term Obligations:*

Applicable to facilities at which hazardous wastes and/or solid wastes will remain on-site, have completed closure and implemented corrective action as required by state and federal laws and regulations and are obligated to perform long-term stewardship activities such as post-remediation groundwater monitoring or maintenance of an engineered control.

#### *RCRA Hazardous Waste Land Disposal Facility:*

Facilities where land disposal of wastes has occurred and waste will remain in place and which are therefore obligated to maintain post-closure care of any land disposal unit including, but not limited to, municipal solid waste landfills with hazardous waste cells, contaminated RCRA units that cannot be certified as closed by removal ("clean closed") in accordance with RCRA, and properties at which hazardous waste is left in place.

#### *Solid Waste Land Disposal Facility:*

Facilities where land disposal of wastes has occurred and waste will remain in place and which are therefore obligated to maintain post-closure care of any land disposal unit including, but not limited to, existing solid waste disposal areas notified by the commissioner to submit a closure or remediation plan pursuant to section 22a-208a(c) CGS or to submit a permit

application pursuant to section 22a-208a(b) CGS, and properties at which solid waste is left in place.

*Corrective Action Management Unit (CAMU):*

Applicable to facilities where remediation wastes, including hazardous wastes, will be managed in a Corrective Action Management Unit.

2. **Initial Fee:** The initial fee as shown on the application form must be submitted with the application. If the applicant is a municipality, the 50 percent fee discount applies. DEP will not process an application unless the required initial fees have been paid.

*Note: For this program, the initial fee is the total permit application fee due.*

3. **Annual Fee:**

In accordance with sections 22a-454b and 22a-454c(b) CGS hazardous waste treatment, storage and disposal facilities are subject to an annual fee of \$3,000. Such fee is due no later than July 1<sup>st</sup> of each year.

In accordance with Section 22a-208-1(g) solid waste disposal areas are subject to an annual fee of \$4,000 for the disposal of municipal solid waste and \$2,950 for the disposal of special waste and/or bulky waste.

4. **Renewal Fee:** The renewal fee as shown on the application form must be submitted with the application. If the applicant is a municipality, the 50 percent fee discount applies. DEP will not process an application unless the required initial fees have been paid.

*Note: For this program, the renewal fee is the same as the initial fee.*

## **Part II B: Permit Modification Type and Fee Information**

*Note: If you are seeking a permit modification, you should consult with the Bureau of Materials Management and Compliance Assurance at 860-424-3372 for specific requirements in modifications prior to submitting a permit application to determine what materials you will be required to submit for your type of modification.*

1. Please check the appropriate box to identify the permit modification type and corresponding fee that applies. The following are explanations of the permit modification types listed.

**Permit Modifications** (Class I Permit Modification Not Requiring Approval of the Commissioner, Class I Permit Modification Requiring the Approval of the Commissioner, Class II or Class III Permit Modification) Title 40 of the Code of Federal Regulations ("40 CFR") Part 270.42 designates three classes of permit modification, Class I (routine and administrative changes), Class II (changes to management techniques or long-term stewardship obligations), and Class III (changes to established monitoring parameters). Class I Permit modifications are minor modifications and are subdivided into two groups: (1) Class I Permit Modifications Not Requiring the Approval of the Commissioner, and (2) Class I Permit Modifications Requiring Approval of the Commissioner. Class II and Class III permit modifications are major modifications. Refer to Appendix I (Classification of Permit Modification) of 40 CFR 270.42 to determine the appropriate designation and classification. The corresponding fee for each classification is listed on the application form.

2. The initial modification fee as shown on the application form must be submitted with the application. DEP will not process an

application unless the required initial fees have been paid.

*Note: For this program, the initial modification fee is the total permit modification fee due.*

### **Part III: Applicant Information**

When completing this part, please use the following standards:

- *Name* - Provide the full, legal *company/firm* name. (If identifying an entity registered with the Secretary of the State, fill in the name exactly as it is shown on the registration.) If identifying an *individual*, provide the legal name (include suffix) in the following format: First Name; Middle Initial; Last Name; Suffix (Jr, Sr., II, III, etc.).
  - *Phone* - Unless otherwise indicated, the phone number provided should be the number where the individual can be contacted during daytime business hours.
  - *Contact Person* - Provide the name of the specific individual within the company whom DEP may contact.
1. *Applicant* - Fill in the applicant's information exactly as it appears on the *Permit Application Transmittal Form*.
  2. *Primary Contact* - If you have authorized a consultant, engineer, attorney or other individual to act for *you* during the processing of the permit application, complete this section. DEP will direct copies of all correspondence and inquiries to this primary contact.
  3. *Attorney* - It is not required that an applicant be represented by an *attorney* or any other agent. If you do have an attorney, complete this section.

4. *Site Owner* – List the site owner(s) if different than the applicant.

5. *Engineer or Consultant* – List engineer(s) or consultant(s) employed or retained to assist in preparing the application.

### **Part IV: Site Information**

#### **1. Site Name and Location**

State the site name; this is the name by which the site is commonly known and/or uniquely identified.

The information given as the location address should be the address of the property at which the proposed activity will take place. Include the street address, municipality, the Tax Assessor's Map, and the Block and Lot Number of the site. These numbers may be found on the most recent tax bill for the property or obtained from the tax assessor's office in the town in which the property is located. If the property does not have a street number, describe the location in terms of the distance and direction from an obvious landmark such as an intersection with another roadway, a bridge, or a river. For example, “. . . on River Street, approximately 1000 feet north of its intersection with Bear Swamp Road.”

Provide the latitude and longitude, in degrees, minutes and seconds, of the approximate center of the facility or site of the proposed work. In addition, please indicate the method used to determine the latitude and longitude coordinates. There are a variety of methods of deriving latitude and longitude coordinates, with the Global Positioning System (GPS) being the most accurate.

#### **2. Indian Lands**

Check the appropriate box to specify if the premise is or will be located on federally recognized Indian lands.

### 3. *Coastal Area: Coastal Management Act*

Activities within the state's coastal area must be consistent with the Connecticut Coastal Management Act (sections 22a-90 through 22a-113j CGS). You may be required to complete a *Coastal Consistency Review Form* (DEP-APP-004) to demonstrate that the activity is consistent with the standards and policies of the Connecticut Coastal Management Act. To determine whether this requirement pertains to you, you must first decide if your activity is, or is proposed to be, located in either the coastal area or the coastal boundary.

The *coastal area*, as defined in section 22a-94 (a) CGS, includes the land and water within the following towns:

Branford	Guilford	Old Saybrook
Bridgeport	Hamden	Orange
Chester	Ledyard	Preston
Clinton	Lyme	Shelton
Darien	Madison	Stamford
<b>Deep River</b>	<b>Milford</b>	<b>Stonington (Borough</b>
East Haven	Montville	and Town of)
East Lyme	New London	Stratford
Essex	New Haven	Waterford
Fairfield	North Haven	West Haven
Greenwich	Norwalk	Westbrook
Groton (City and	Norwich	Westport
Town of)	Old Lyme	

The *coastal boundary*, as defined in section 22a-94(b) CGS, is a designated region within the coastal area. It is delineated on DEP-approved coastal boundary maps which are available for review at the DEP Office of Long Island Sound Programs (OLISP), the DEP File Room, and municipal offices of towns located in the coastal area. Copies of these maps may also be purchased from DEP Maps and Publications.

#### **Activities within the coastal boundary:**

If your activity is, or is proposed to be, located in the coastal boundary, and you are applying for either a new permit or a modification to an existing permit, you must complete a *Coastal Consistency Review Form* (DEP-APP-004) and submit it with your application as Attachment D.

For renewals of existing permits for activities located within the coastal boundary, you are not required to submit a *Coastal Consistency Review Form* with your initial application materials. However, DEP may notify you that submission of this form is required to process your application depending upon the specific activities to be conducted and their potential impact on coastal resources.

#### **Activities outside the coastal boundary but within the coastal area:**

For permit applications (new permits, modifications, or renewals) for activities located outside of the coastal boundary, but within a town in the coastal area, you are not required to submit a *Coastal Consistency Review Form* with your initial application materials. However, DEP may notify you that submission of this form is required to process your application depending upon the specific activities to be conducted and their potential impact on coastal resources.

For assistance in completing the form, or if you have questions on this process, call OLISP at 860-424-3034.

### 4. *Endangered or Threatened Species*

Section 26-310 (a) of the Connecticut General Statutes states that each state agency, in consultation with the DEP commissioner, shall conserve endangered and threatened species and their essential habitats, and shall ensure that any activity authorized, funded or performed by such agency does not threaten the continued existence of any endangered or threatened species or result in the destruction or adverse modification of habitat designated as essential to such species.

Please refer to the “*Connecticut Natural Diversity Data Base- (NDDB) Review of Endangered or Threatened Species*” located on the DEP website at: [www.ct.gov/dep/endangeredspecies](http://www.ct.gov/dep/endangeredspecies) (Review/Data Requests) to determine if your activity is located within an area identified as a habitat for endangered, threatened or



special concern species. If applicable, include copies of any correspondence to and from the NDDDB, including a copy of the completed *CT NDDDB Review Request Form* with your application as Attachment E.

## **5. Aquifer Protection Areas**

Aquifer protection areas are defined in sections 22a-354a through bb CGS and are the areas that contribute water to public water supply wells. Many towns within the state are required to establish Aquifer Protection Areas. Level A areas are final, regulated areas under the aquifer protection program. Level B areas are preliminary approximations of aquifer protection areas that have not yet been mapped to final standards, so the shape of the area may change when final mapping is completed. Level B maps provide an approximation of the Aquifer Protection Areas. Please review the list of towns, available on the DEP website, to determine if your site location is within one of these towns and, if yes, check the appropriate map, also available on the DEP website, to see if the site is within the area identified on a Level A or Level B map. If your site location is within an area identified in a Level A or Level B map, you must determine if your activity may be regulated either by the local aquifer protection agency or the DEP aquifer protection program.

The following DEP website, [www.ct.gov/dep/aquiferprotection](http://www.ct.gov/dep/aquiferprotection), provides the list of towns and maps and information to determine if your activity may be regulated either by the local aquifer protection agency or the DEP Aquifer Protection Program. For further assistance, you may call the Aquifer Protection Program at 860-424-3020.

## **6. Conservation or Preservation Restriction**

If the subject site has a conservation or preservation restriction, proof of written notice of this application to the holder of such restriction or a letter from the holder of such restriction verifying that this

application is in compliance with the terms of the restriction, must be submitted as Attachment F.

## **Part V: Site History/Waste Management History:**

*If an Environmental Conditions Assessment Form (ECAF) has been submitted to the DEP or EPA within the last two years, the information required by this part of the application can be satisfied by noting the date the ECAF was submitted and include a copy of the submitted ECAF as Attachment S.*

1. **Summary of Industrial/Commercial History**  
Provide a description of the non-residential activities known to have occurred at the site, the time frames in which these activities occurred, and identify the operator of the site under which these activities occurred. This should include the types of products manufactured, processed or repaired, the types of services rendered and a list of all other corporate names under which the information may be available concerning the site.

### **2. Hazardous Substances or Petroleum Products**

Specify the hazardous substances, including oil and petroleum products, stored, handled or disposed of at the site, or present in raw materials, intermediate or final products or byproduct, or used as a chemical additive or treatment substance, in quantities greater than five gallons. See Appendix B and D of the section 22a-430-4 RCSA and Title 40 of the Code of Federal Regulations (“CFR”) Part 261 Appendix VIII and 40 CFR Part 116.4 for listed hazardous wastes and hazardous substances.

Indicate how and where chemicals were received, stored, handled or shipped or disposed of. This should include, but is not limited to, present and former container storage areas, underground and above ground tanks, dispensing areas, discharge pipes, dry wells, any pits, pond, piles, lagoons or

landfills used for waste disposal or storage on site. The site plan should also indicate the location of these activities.

3. *RCRA Status*

- a. Specify whether the site has been a treatment, storage or disposal facility (TSDF), a large quantity generator (LQG), or a small quantity generator (SQG).
- b. Specify if the site is currently permitted under RCRA Interim Status or has been issued a RCRA Part B Permit.

4. *Reported Releases* - Specify whether any releases/spills at the site have been reported to CT DEP Emergency Response and Spill Prevention Division. If such report(s) have been made, list the date of the release, the material which was released and the quantity released, if known.

5. *Previous Form Filings with CT DEP Property Transfer Program*

Specify whether any certifications (Form I, II, III, or IV) have been submitted to the DEP pursuant to section 22a-134a CGS regarding the transfer of operations or real property relating to a “hazardous waste establishment”. If such certifications have been submitted, list the forms submitted and the date such form was submitted.

6. *CT DEP Staff Involved*

Please list the names of DEP staff who currently are or have previously been involved with the review of the environmental investigation and/or remediation of the site.

## **Part VI: Environmental Investigation**

*This part of the application shall be completed by applicants that have completed environmental investigation and are applying for either a “Closure and Corrective Action” or a “Corrective Action” Stewardship Permit.*

*If the information requested in this part of the application has been previously submitted to the DEP or EPA, provide a list of the documents and dates submitted as Attachment T.*

1. *Field Investigation*

- a. *Phase 1/ Phase 2/ Phase 3* – Provide the date (month and year) the the following phases have been performed: Phase 1 (site assessment), Phase 2 (investigation of releases), and the Phase 3 (investigation of the extent of contamination).
- b. *Potential Release Areas* - Provide the following information regarding the number of potential release areas or areas of concern at the site:
  - *Identified* – Provide the number of specific locations where a release of hazardous substances or petroleum products are known to have occurred or may have occurred – “potential release areas”.
  - *Tested* – Provide the number of the “potential release areas” which were the subject of laboratory analyses or field screening.
  - *Release Detected* – Provide the number of the “potential release areas” which, as a result of analytical testing, were determined to have had a release of contaminants.

2. *Soil Investigation*

- a. *Number of Samples Screened/Analyzed*
  - *Samples Screened* - Provide the total number of samples on which tests were done in the field to screen for contaminants. This would include

testing methods such as FID or PID organic vapor analysis, or conductivity or pH measurements.

- *Samples Analyzed* - Provide the number of samples that were analyzed by a State or EPA certified laboratory.

b. *Surface Techniques Used*

Specify the surface investigation methods utilized such as geophysical reconnaissance methods, including: seismic refraction seismic reflection, ground penetrating radar, magnetometry, resistivity, electromagnetics, and gravimetry.

c. *Subsurface Techniques Used*

Specify the subsurface investigation methods utilized such as split spoon sampling, Geoprobe drilling, drive-and-wash drilling, horizontal drilling, test pits or hand augering.

3. *Groundwater Investigation*

a. *Number of Samples/Rounds of Sampling*

Provide the number of groundwater samples that were analyzed as part of the investigation and the number of rounds of groundwater sampling performed.

b. *Number of Monitoring Wells*

Provide the number of discrete monitoring wells used in the investigation of the site.

For each monitoring well, list the well number (as listed on the Site Plan), the type of well, and geologic unit that the well is screened in or open to (e.g., MW-1, 2", screened from 15-25', at watertable in fine sand).

c. *Number of Other Wells*

Provide the number of discrete groundwater sampling points other than monitoring wells (such as domestic

wells, process wells, irrigation wells, or other points where groundwater was accessed for sampling), were used in the investigation of the site.

For each "other well", provide the address where the well is located, and utilizing available information, specify the type of well and geologic unit that the well is screened in or open to (e.g. DW-1, 6" bedrock domestic well at 15 Main Street, no log available).

d. *Extent of Plume*

For areas of the site in which the groundwater quality has been affected by a release, indicate if the extent of the affected area has been fully characterized.

e. *Techniques Used* – Specify the methods which were utilized for the investigation of groundwater quality and aquifer characteristics.

4. *Phases of Project Completed to Date*

Indicate the phases of remediation of this site that have been completed and the date completed.

**Part VII: Supporting Documents**

All permit applications must include Attachments A through T, unless otherwise noted in these instructions. Check the appropriate box by each attachment being submitted as verification that all applicable attachments have been submitted. Please label all attachments as referenced in the permit application form and these instructions and be sure to include the name of the applicant as indicated on the *Permit Application Transmittal Form*.

Refer to Appendix A of these instructions for a list of the supporting documents that must be included in the permit application package for each type of Stewardship Permit.

## **Attachment A: Executive Summary**

Submit as, Attachment A, an executive summary which includes:

1. A Table of Contents of the application package, which includes:
  - the *Permit Application Transmittal Form* (DEP-APP-001);
  - the *Permit Application for a Stewardship Permit* (DEP-STWD-APP-500);
  - all *supporting* documents, which include plans, drawings, reports, studies, appendices, or other documentation which are attached as part of the application.

The supporting documents should be listed as follows:

Title of the document, the corresponding attachment label as indicated on the permit application form and the number of pages included in the document (e.g., Executive Summary - Attachment A- 4 pgs.).

2. A brief project description which includes: a description of the proposed regulated activities; a synopsis of the environmental and engineering analyses; brief summary of data analysis; a conclusion of any environmental impacts and the proposed project timeline.
3. For renewals, provide a list of changes, if any, in circumstances or information on which the previous permit was based.

## **Attachment B: Applicant Background Information**

A completed *Applicant Background Information Form* (DEP-APP-008) must be submitted as Attachment B for all permit applications.

## **Attachment C: Applicant Compliance Information Form**

Section 22a-6m CGS provides for DEP review of an applicant's record of compliance with the environmental laws of Connecticut, any other state and the federal government. Under the law, DEP may consider the applicant's environmental compliance record, as well as the record of the applicant's principals and any parent companies or subsidiaries, when reviewing a permit application. All permit applications for activities **not previously permitted by DEP** must include a completed *Applicant Compliance Information Form* (DEP-APP-002) as Attachment C.

## **Attachment D: Coastal Consistency Review Form**

Activities within the state's coastal area must be consistent with the Connecticut Coastal Management Act (CGS Sections 22a-90 through 22a-112). You may be required to complete a *Coastal Consistency Review Form* (DEP-APP-004) to demonstrate that the activity is consistent with the standards and policies of the Connecticut Coastal Management Act. Please refer to the instructions in Part III, item 3, to determine if this requirement pertains to you

## **Attachment E: CT NDDB Information**

Submit copies of any correspondence provided to or received from the CT NDDB program, including a copy of a completed *CT NDDB Request Form* (DEP-APP-007) as Attachment E, as explained in Part III, item 4 of these instructions.

## **Attachment F: Conservation or Preservation Restriction**

If the property is subject to a conservation or preservation restriction, submit, as Attachment F, proof of written notice of this application to the holder of such restriction or a letter from the holder of such restriction verifying that this application is in compliance with the terms of the restriction.

## **Attachment G: Business Information**

Submit, as Attachment G, any facility ownership, control and use agreements. The applicant must provide signed copies of any lease, deed or other agreements regarding the ownership, control, or use of the facility. Such documents include but are not limited to the following: land deeds (e.g., warranty deed; certified deed; lease agreement; Schedule A; etc.)

## **Attachment H: Facility Plans**

Submit the following as Attachment H:

1. *USGS Topographic Map* – An 8 ½” by 11” figure, based on US Geological Survey 1:24,000 scale quadrangles, delineating the limits of the property, with directional arrows in the margins of the map to point out the site. An area extending at least ½ mile from the property line in all directions should be included. The USGS Map should include a title block listing the site name, street address, town, map scale, the date prepared or revised, and the names of the USGS maps utilized
2. *Facility Site Plan* – A drawing showing the layout of the facility must be included. More than one map may be used if needed. The drawing(s) must show the following:
  - map scale (minimum scale is 1in.= 200 ft.)
  - a meridian arrow showing north;
  - map date;
  - property boundaries;
  - contours sufficient to show surface water flow;
  - present and historic buildings, structures, and utilities located on-site;
  - location of access controls including internal roads, limits of pavement, right-of-ways, tree lines and fencing;

- areas occupied by current and historic storage, treatment, recovery, transfer or disposal operations consisting of; current and historic above ground tank locations, underground tank locations, drum storage areas, chemical dispensing areas, degreasers, recycling stills, dumpsters, lagoons, pits, piles, landfills;
- potential release areas;
- process wells, septic systems, dry wells, sumps, floor drains;
- wetlands and water bodies;
- sampling locations;
- monitoring wells; and
- areas of current and historic remediation.

## **Attachment I: Revised RCRA Hazardous Waste Part A Permit Application**

*This is only required for RCRA hazardous waste facilities.*

Submit, as Attachment I, a copy of the RCRA Hazardous Waste Part A Permit Application (EPA Form 8700-23) submitted to the EPA.

If a revised form must be submitted, the form may be obtained from the EPA’s website [www.epa.gov/osw/inforesources/data/form8700/forms.htm](http://www.epa.gov/osw/inforesources/data/form8700/forms.htm) or by contacting the DEP Permitting Section of the Waste Engineering and Enforcement Division at 860-424-3372.

## **Attachment J: List of Solid Waste Management Units/ Areas of Concern**

If known submit, as Attachment J, a list of the solid waste management units and areas of concern located on-site. Such list shall include: a brief description of the unit, the type of unit (e.g. tank, landfill, container storage area etc...), the dimensions of the unit/area, the period of operation, and the wastes managed within.

## **Attachment K: Closure Plan and Cost Estimate**

*For RCRA hazardous waste facilities:*

Submit, as Attachment K, a closure plan prepared in accordance with requirements of section 22a-449(c)-104(a)(1) RCSA incorporating 40 CFR 264 Subpart G that includes the methods and procedures to be utilized for closing the facility. The closure plan should be developed in accordance with the standards and guidelines developed by the DEP. The cost estimate for closure shall reflect the requirements of 40 CFR 264.142, the activities proposed in the closure plan and be based upon third party costs.

For applicants applying for “*RCRA Hazardous Waste Land Disposal Facility*” or “*CAMU*” Appendix B of these instructions contains additional information that must be included in the closure plan.

*For solid waste disposal areas:*

Submit, as Attachment K, a closure plan prepared in accordance with requirements of section 22a-207(26) of the CGS. The cost estimate for closure shall reflect the requirements of 40 CFR 264.142, the activities proposed in the closure plan and be based upon third party costs.

For applicants applying for “*Solid Waste Land Disposal Facility*” Appendix B of these instructions contains additional information that must be included in the closure plan.

## **Attachment L: Post-Closure Plan and Cost Estimate**

Submit, as Attachment L, a post-closure plan for the maintenance of the facility’s closed land disposal unit(s) developed in accordance with the requirements of 40 CFR 264 Subparts, F, G, K, L, and N. The cost estimate for post-closure shall reflect the requirements of 40 CFR 264.144, the activities proposed in the post-closure plan and be based upon third party costs. The cost estimate for shall reflect the activities proposed in the post-closure plan and be based upon third party costs.

*For solid waste land disposal facilities:*

The post-closure plan and cost estimate may be included in the closure plan (Attachment K), pursuant to section 22a-207(26) of the CGS.

For applicants applying for “*RCRA Hazardous Waste Land Disposal Facility*”, “*Solid Waste Land Disposal Facility*” or “*CAMU*” Appendix B of these instructions contains additional information that must be included in the post-closure plan.

## **Attachment M: Groundwater Monitoring Plan and Cost Estimate**

Submit, as Attachment M, if not included in Attachment L, a groundwater monitoring plan and cost estimate which includes the methods and procedures specified in section 22a-449(c)-105(c) RCSA, and the standards and guidance developed by the DEP. The cost estimate for shall reflect the activities proposed in the groundwater monitoring plan and be based upon third party costs.

*For solid waste land disposal facilities:*

The groundwater monitoring plan and cost estimate may be included in the closure plan (Attachment K), pursuant to section 22a-207(26) of the CGS.

For applicants applying for “*RCRA Hazardous Waste Land Disposal Facility*”, “*Solid Waste Land Disposal Facility*” or “*CAMU*” Appendix B of these instructions contains additional information that must be included in the groundwater monitoring plan.

## **Attachment N: Site Characterization Plan and Cost Estimate**

Submit, as Attachment N, a site characterization plan and cost estimate based on DEP’s *Site Characterization Guidance Document* dated September 2007 or as revised which can be found on the DEP’s website at [www.ct.gov/dep/lib/dep/waste\\_management\\_and\\_disposal/remediation\\_waste/RCRA\\_Closure\\_Plan\\_Guidance.pdf](http://www.ct.gov/dep/lib/dep/waste_management_and_disposal/remediation_waste/RCRA_Closure_Plan_Guidance.pdf) The cost estimate shall reflect the activities proposed in the site characterization

plan and be based upon third party costs.

#### **Attachment O: Remedial Action Plan(s) and Cost Estimate(s)**

Submit, if applicable and developed, a Remedial Action Plan(s) (“RAP”) and cost estimate(s) as Attachment O. Such Plan and cost estimate must be developed in accordance with the DEP’s prevailing standards and guidelines detailing the steps to be taken to perform corrective action at the site and to achieve compliance with sections 22a-449(c)-104(a)(1) and 22a-133k-1 et. seq. RCSA.

The cost estimate(s) shall reflect the activities proposed in the remedial action plan(s) and be based upon third party costs.

#### **Attachment P: Financial Assurance**

Financial assurance mechanism(s) representative of the facility’s cost estimates must be identified and submitted as Attachment P.

Acceptable financial assurance mechanisms are discussed in guidance documents available through the Waste Engineering and Enforcement Division. Please call 860-424-3372 for additional information.

#### **Attachment Q: Public Participation Plan**

Submit, as Attachment Q, a public participation plan for the site. Such plan, at a minimum, shall provide for public meeting(s), and public notice prior to: 1) the commencement of any remediation at the site and 2) the Commissioner’s final determination that remediation is complete.

The public notice shall be in the form of: 1) an announcement in the newspaper having substantial circulation in the municipality of which the site is located; 2) a visible and accessible sign; and 3) a broadcast media announcement (for RCRA hazardous waste facilities only).

#### **Attachment R: Quality Assurance Project Plan (QAPP)**

Submit, as Attachment R, a QAPP prepared in accordance with the Quality Assurance Guidance for Conducting Brownfields Site Assessments US EPA OSWER Directive No. 9230.0-83P and in accordance with Connecticut’s Reasonable Confidence Protocols. If a Quality Assurance Plan (QAPP) has been approved, provide a copy of the approval issued by either the DEP or EPA as Attachment R.

#### **Attachment S: Environmental Conditions Assessment Form**

If an Environmental Conditions Assessment Form (ECAAF) has been submitted to the DEP or EPA within the last two years, the information required by Part V of the application can be satisfied by submitting a copy of the form as Attachment S.

#### **Attachment T: Environmental Investigation**

If the information requested in “Part VI: Environmental Investigation” of the application has been previously submitted to the DEP or EPA, the information required by Part VI may be satisfied by providing a list of the documents and dates submitted as Attachment T.

#### **Part VIII: Applicant Certification**

After the application has been completed it must be reviewed and signed by both the applicant(s) and the individual(s) who actually prepared the application and any part thereof required by the application. This includes consultants, professional engineers, surveyors, soil scientists, etc. By their signature, they certify that to the best of their knowledge and belief, the information contained in the application, including all attachments, is true, accurate and complete.

The certification of the application package must be signed as follows:

1. For an individual(s) or sole proprietorship: by the individual(s) or proprietor, respectively;



2. For a corporation: by a principal executive officer of at least the level of vice president;
3. For a limited liability company (LLC): a manager, if management of the LLC is vested in a manager(s) in accordance with the company's "Articles of Organization", or a member of the LLC if no authority is vested in a manager(s);
4. For a partnership: by a general partner;
5. For a municipal, state, or federal agency or department: by either a principal executive officer, a ranking elected official, or by other representatives of such applicant authorized by law.

An application will be considered insufficient unless all required signatures are provided.

#### **Available Resources:**

Below is a list of possible resources for specific information required for this application. Be sure to also check the DEP website, [www.ct.gov/dep](http://www.ct.gov/dep) and your local town hall or library for maps and other reference materials.

Both the DEP Maps and Publications 860-424-3555 and the DEP File Room 860-424-4180 are located on the store level at 79 Elm Street, Hartford, CT. Please call the appropriate office in advance for hours of operation.

For the subject permit application form, instructions and other required documents visit the DEP website at:

([www.ct.gov/dep/permits&licenses](http://www.ct.gov/dep/permits&licenses)) (Air, Waste, Water, Land Use / Waste and Materials Management Permits and General Permits)

- Coastal Boundary Areas: Town Hall and/or DEP Maps and Publications; "Coastal Boundary Map". Additional information: Office of Long Island Sound Programs: 860-424-3034
- Coastal Resource Maps: Town Hall and/or DEP Maps and Publications 860-424-3555

- USGS Topographic Quadrangle Map: ([www.ct.gov/dep/gis](http://www.ct.gov/dep/gis)) DEP Maps and Publications, 860-424-3555, or USGS Office, 303-202-4700, or US Geological Survey, Western Distribution Branch, Box 25286, Denver Federal Center, Denver, CO 80225 (sells USGS maps and publications) [www.usgs.gov](http://www.usgs.gov)
- Endangered or Threatened Species Areas: DEP File Room; "State and Federal Listed Species and Natural Communities"; [www.ct.gov/dep/endangeredspecies](http://www.ct.gov/dep/endangeredspecies)
- Aquifer Protection Area Maps: [www.ct.gov/dep/aquiferprotection](http://www.ct.gov/dep/aquiferprotection), DEP Maps and Publications
- Pollution Prevention: A variety of pollution prevention publications are available from DEP's Office of Pollution Prevention 860-424-3297
- State and federal statutes and regulations are available for review at various locations:  
On the web:
  - State Statutes [www.cga.ct.gov/asp/menu/Statutes.asp](http://www.cga.ct.gov/asp/menu/Statutes.asp)
  - DEP website for Statutes and Regulations: [www.ct.gov/dep/laws-regs](http://www.ct.gov/dep/laws-regs)
  - US EPA website for Federal Laws, Regulations (Code of Federal Regulations; CFR), Policy, Guidance and Legislation [www.epa.gov/lawsregs](http://www.epa.gov/lawsregs)

#### **Book Format:**

- State Library (Hartford)
- University Law Schools (UCONN-Hartford, Yale)
- Superior Courthouse Libraries (located throughout the state)
- Town Halls and Libraries (statutes)



## Appendix A

### Supporting Documentation Required For Each Type of Stewardship Permit

<i>Attachment</i>	<i>Description</i>	<i>Classes of Stewardship Permit</i>				
		<i>Closure and Corrective Action</i>	<i>Corrective Action</i>	<i>Long-term Obligations</i>	<i>SW and RCRA HW Land Disposal Facility</i>	<i>CAMU</i>
A	Executive Summary	X	X	X	X	X
B	Applicant Background Information	X	X	X	X	X
C	Applicant Compliance Information	X	X	X	X	X
D	Coastal Consistency Review, if applicable	X	X	X	X	X
E	CT NDDB Information, if applicable	X	X	X	X	X
F	Conservation or Restriction Information, if applicable	X	X	X	X	X
G	Business Information	X	X	X	X	X
H	Facility Plans	X	X	X	X	X
I	RCRA Part A Form	X	X	X	X	X
J	List of Solid Waste Management Units / Areas of Concern	X	X	X	X	X
K	Closure Plan and Cost Estimate	X			X	X
L	Post-Closure Plan and Cost Estimate			X	X	X
M	Ground Water Monitoring Plan and Cost Estimate			X	X	X
N	Site Characterization Plan and Cost Estimate	X	X			
O	Remedial Action Plan(s) and Cost Estimate		X		X	X
P	Financial Assurance	X	X	X	X	X
Q	Proof of Notification for Public Participation Plan	X	X	X	X	X
R	Quality Assurance Project Plan	X	X	X	X	X
S	Copy of ECAF form, if applicable	X	X	X	X	X
T	List of documents and dates to support Environmental Investigation, if applicable	X	X			

\*Please note: The required plans for the classes of Stewardship Permits, noted in the table above, that have not been developed and included with the application, will be required to be submitted at a future date by the Stewardship Permit.

## **Appendix B**

### **Requirements for Land Disposal Facilities and Corrective Management Units**

Applications submitted for a Solid Waste or RCRA Hazardous Waste Land Disposal Facility or Corrective Action Management Unit shall specifically include the following information:

#### **Closure Plan**

- Provide a list of wastes in each hazardous waste cell, the volume of waste(s), and the physical and chemical characteristics of the waste(s).
- The aerial configuration of the landfill or CAMU
- Documentation that proposed final cover will:
  - Provide long-term minimization of migration of liquids through the closed landfill;
  - Function with minimum maintenance;
  - Promote drainage and minimize sedimentation and erosion;
  - Settle/subside without losing integrity; and
  - Be less permeable than bottom liners or subsoils.

#### **Post-Closure Plan**

##### *General Requirements:*

- Location and number of post-closure plans.
- Identification and location (address and telephone number) of person responsible for facility during post-closure period.
- Procedures for updating post-closure plan.
- General description of the closed facility.
- Documentation of facility relative to 100-year flood plain level:
  - If within a 100-year flood plain, documentation that unit can withstand a 100-year flood without washout of hazardous waste by either:
  - Analysis of hydrodynamic/hydrostatic forces resulting at the site from a 100-year flood; and description of operating units, the design of the flood protection devices and how they will prevent washout; or
  - A plan for the removal of the waste before washout that includes: the time of removal relative to the flood levels; the estimated time to remove all waste; the location to which waste will be moved to and proof of compliance for location; a detailed description of personnel equipment and the procedures for waste removal to ensure availability; and the analysis of potential discharge during the movement of waste.
- Description of groundwater monitoring activities and frequencies.
- Description of the maintenance activities and frequencies for the final containment structures and facility monitoring equipment.
- Documentation of the notice on the deed that states: the land was used to manage wastes; statement of restriction; and documentation of type, location and quantity of wastes filed with local authority and EPA

##### *Inspection Procedures and Schedule:*

- Written inspection procedures identifying the features/items to be inspected, the types of problems to be checked, the frequency of inspection and the timeframe for correcting problems and the associated inspection logs/records.

- Statement as to where the inspection schedule and logs will be kept at the facility or an alternate location.

*Cost Estimate:*

- Cost estimate from a third party for performing all the activities in the Post-Closure Plan.
- Documentation of establishment of financial assurance mechanism.

*Additional Requirements for Surface Impoundments, Waste Piles, Landfills and CAMUs:*

*Surface Impoundments:*

- A list of hazardous wastes in each impoundment.
- Procedures for the maintenance of the groundwater monitoring system.
- Procedures for ensuring compliance with 40 CFR 264 Subpart F.
- Procedures for preventing run-on/run-off and final cover damage.
- Procedures for inspecting weekly and after storms: (1) the liner/cover; and (2) the presence of liquid in leak detection system and the integrity of dikes/containment devices.

*Waste Piles:*

- A list of hazardous wastes in each pile.
- Procedures for post-closure care that meet the requirements for landfills specified below.
- Procedures for inspecting weekly and after storms: (1) the liner/cover; and (2) the operation of run-on/run-off controls, the presence of liquids in leak detection system, proper function of the wind dispersal controls, and the presence of leachate in and the proper operation of the leachate collection/removal system.

*Landfills or CAMU:*

- A list of hazardous wastes placed in each cell.
- A description of the system for controlling run-on from peak discharge and run-off water volume from a 24-hour 25-year storm and the procedures for managing the collection and holding facilities associated with the control systems.
- Procedures for the maintenance and repair of the final cover.
- Procedures for the monitoring and maintenance of the leak detection system.
- Procedures for the operation of the leachate collection/removal system.
- Procedures for the maintenance of the groundwater monitoring system.
- Procedures for ensuring compliance with 40 CFR 264 Subpart F.
- Procedures for preventing erosion of the final cap due to run-on and run-off.
- Procedures for the protection and maintenance of benchmarks.
- Procedures to be undertaken if liquid is found in leak detection system.
- Procedures for inspecting weekly and after storms: (1) the liner/cover; and (2) the operation of run-on/run-off controls, the presence of liquids in the leak detection system, the proper functioning of wind dispersal controls, and the presence of leachate in and proper operation of leachate collection/removal system.

## Groundwater Monitoring Plan 40 CFR 264.97

- State the interim status period of groundwater monitoring data summary.
- The identification of the uppermost and hydraulically connected aquifers under the facility, including the water flow rate and direction and the bases for identification.
- A topographic map that includes: the delineation of waste management area(s) and point(s) of compliance, location of groundwater monitoring well, and the location of the aquifers.
- Description(s) of the existing contamination including: the delineation of plume extent, Appendix IX constituent concentrations throughout the plume and the maximum concentrations in the plume.
- Detailed plan(s) and engineering report(s) that at a minimum include:
  - A description of the wells, including: the number, locations, depths, assurance of unaffected background water measurement, assurance of compliance point groundwater measurement, and description of the casing;
  - A description of the sampling/analysis procedures that at a minimum includes: the sample collection methods, sample preservation/shipment, analytical procedures, and chain of custody controls;
  - Documentation of proper/adequate analytical procedures; and
  - Procedures for determining the groundwater elevation of each sample.

### *Detection Monitoring Program (40 CFR 264.98)*

- A list of the indicator parameters, waste constituents, reaction products to be monitored for, including:
  - The type of waste(s), quantities, and concentrations expected;
  - Mobility, stability, persistence in unsaturated zone;
  - Detectability in groundwater; and
  - The background groundwater concentration values and coefficients of variation established by:
    - Use of an appropriate groundwater monitoring system, and
    - Quarterly sampling of upgradient wells for one year, or quarterly sampling of other wells for one year, and
    - Data from a minimum of one sample/well and minimum of four samples per quarter, or presentation of procedures to calculate such values.
- Description of an appropriate groundwater monitoring system installed at the compliance point.
- Procedures for collecting semi-annual groundwater samples at the compliance point during the post-closure period.
- Procedures for the annual determination of uppermost aquifer flow rate and direction.
- Documentation of sample collection and analysis procedures.
- Procedure for determining a statistically significant increase for any monitored parameter or constituent by:
  - Comparing compliance point data to background value data using procedures in 40 CFR 264.97(h)(1) or (2) and section 22a-133k et. seq., RCSA and
  - Providing an estimate of the time period after sampling completion necessary to obtain results
- Procedures to be implemented if a statistically significant increase in any constituent or parameter is identified at any compliance point monitoring well, including:
  - Written notification to Commissioner;
  - Sample collection and analysis methods for all Appendix IX constituents at all monitoring wells; and

- The method for establishing Appendix IX constituent background values.

#### *Compliance Monitoring Program (40 CFR 264.99)*

- A list of wastes previously handled at the facility.
- Characterization of the contaminated groundwater including, hazardous constituents identified and concentrations.
- Description of compliance monitoring system at the compliance point.
- A list of hazardous constituents to be compliance monitored.
- Proposed compliance period.
- Procedures for collecting quarterly samples at compliance point during compliance period.
- Procedures for establishing background concentration values for constituents that are based on: use of an appropriate groundwater monitoring system, and data that is available prior to post-closure issuance, data that accounts for measurement errors in sampling and analysis, data that accounts for seasonal groundwater quality fluctuations, data from a minimum of one sample per well and a minimum of four samples from monitoring system each time the system is sampled.
- Proposed concentration limits for the constituents with justification based on 40 CFR 264.94 and section 22a-133k et. seq. RCSA.
- Procedures for the annual determination of uppermost aquifer flow rate and direction that includes;
  - Procedures for annual testing of all compliance point wells for Appendix IX constituents;
  - Documentation of all sampling and analysis procedures; and
  - Procedures for determining a statistically significant increase for any monitored constituent by: comparing compliance point data to the concentration limit using the procedure in 40 CFR 264.97(h)(2) or providing an estimate of the time period after sampling completion necessary to obtain results.
- Procedures to be implemented if the groundwater protection standard or a criterion identified in section 22a-133k et. seq. RCSA is exceeded at any compliance point monitoring well, including:
  - Written notification to the Commissioner;
  - Preparation of permit modification application; and
  - Description of Corrective Action Program.

#### *Corrective Action Program 40 CFR 264.100*

- Characterization of contaminated groundwater including, hazardous constituents identified and concentrations.
- Concentration limits for each hazardous constituent.
- Detailed plan(s) and engineering report(s) describing the corrective actions to be taken at the compliance point(s).
- Time period necessary to implement corrective action program.
- Description of groundwater monitoring program that will be sufficient to assess adequacy of the proposed corrective action and compares to section 22a-133k et. seq. RCSA.
- Description of the corrective action to be taken for constituents in groundwater between compliance point and down gradient facility boundary.
- Procedures and content for semi-annually submitting written reports to the DEP on program effectiveness.